

RONALD G LYNCH  
4832 EAGLESHAM DR.  
ORLANDO, FLORIDA 32826  
(407) 275-2614  
Fax (407) 482-1664

**EDUCATION:**

UNIVERSITY OF MIAMI, Miami, Florida 1962  
Doctor of Jurisprudence

UNIVERSITY OF MIAMI, Miami, Florida 1958  
Bachelor of Business Administration

**EXPERIENCE:**  
1995- 2000

UNIVERSITY OF CENTRAL FLORIDA  
Orlando, Florida

Instructor. Classes taught are "Security Administration", "Criminal Justice Manager", "Police and Society" and "Policy Development For a Police Agency".

1993-1995

ORANGE COUNTRY SHERIFF'S OFFICE  
Orlando, Florida

Colonel/Commander. Responsible for training in all high liability issues, management and development of standards to meet national guidelines and involved in the development of every policy and procedure for the Agency.

1989-1993

STATE BUREAU OF INVESTIGATION  
Raleigh, North Carolina

Special Assistant to the Director

1971-1993

UNIVERSITY OF NORTH CAROLINA  
Institute of Government  
Chapel Hill, North Carolina

Associate Professor. Advisor to local agencies on police and security procedures.

1970-1971

DEPARTMENT OF PUBLIC SAFETY  
Lakewood, Colorado

Chief of Police

1967-1970

INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE  
Washington, D.C.

Management and Operational Consultant. Surveyed and consulted with law enforcement agencies through out the United States in upgrading policies, practices and procedures.

1965-1967

ATTORNEY AT LAW  
Miami, Florida

PENGAD-Byronne, N. J.

**PLAINTIFF'S  
EXHIBIT**

"4"

Private Practice

1958-1965

DADE COUNTY PUBLIC SAFETY DEPARTMENT  
Now called METROPOLITAN POLICE DEPARTMENT  
Dade County, Miami, Florida

Investigator in Crimes against Property, Juvenile, Homicide  
and Crime Prevention Officer

Commander in Homicide, Juvenile, General Investigations,  
Civil Process and Jail.

1955-1958

MIAMI POLICE DEPARTMENT  
Miami, Florida

Police Officer

**AREAS OF EXPERTISE:**

Management Practices  
Standards of Law Enforcement Conduct  
Law Enforcement Policies and Procedures  
Law Enforcement Training  
Personnel Administration and Employment Practices  
Arrest, Search and Seizure  
Use of Force, Lethal and Non Lethal  
Vehicle Pursuit  
Private Security  
Crime Prevention

**MEMBERSHIPS:**

Bar of the State of Florida  
Bar of Supreme Court of the United States  
Bar Federal Court, Southern District of Florida  
International Association of Chiefs of Police  
Central Florida Criminal Justice Council  
Colorado Police Chiefs Association  
North Carolina Police Chiefs Association  
Former certified Law Enforcement Officer, State of Florida  
Police Executive Research Forum

**TEACHING EXPERIENCE:**

University of North Carolina  
Chapel Hill, North Carolina

University of Central Florida  
Orlando, Florida  
American University  
Washington, D.C.

Security Directors  
Mobil Oil Corporation

Broward Community College  
Ft. Lauderdale, Florida

Mid-Florida Technical Institute  
Orlando, Florida

Seminole Community College  
Sanford, Florida

St. Petersburg Junior College  
St. Petersburg, Florida

Central Piedmont Community College  
Charlotte, North Carolina

Dade County Community College  
Miami, Florida

**CONSULTATIONS:**

Mobil Oil Corporation  
I.B.M.

Wilmington, North Carolina  
Elizabeth City, North Carolina  
Wilson, North Carolina  
Greenville, North Carolina  
Chapel Hill, North Carolina  
Durham, North Carolina  
Raleigh, North Carolina  
Charlotte, North Carolina  
Greensboro, North Carolina  
Winston Salem, North Carolina  
Lexington, North Carolina  
Carrboro, North Carolina  
Asheville, North Carolina  
Waynesville, North Carolina  
Mecklenburg County, North Carolina  
Orange County, North Carolina  
Wilson County, North Carolina  
Gaston County, North Carolina  
Gastonia, North Carolina  
Broward Sheriff's Office, Florida  
Pompano Beach, Florida  
Plantation, Florida  
Charleston, South Carolina  
Department of Public Safety, St. Petersburg, Florida  
Biloxi, Mississippi  
Gallagher-Westphall Liability Group, Indian Valley, Virginia

**SURVEY CITIES FOR LAW ENFORCEMENT EFFECTIVENESS:**

Wilson County, North Carolina  
Jefferson County, Kentucky  
Louisville, Kentucky  
Cincinnati, Ohio  
Seattle, Washington  
Phoenix, Arizona  
Hamden, Connecticut  
Puerto Rico  
State of Vermont  
Chicago, Illinois  
Virgin Islands  
Florida Department of Law Enforcement  
Orlando, Florida  
Hillsborough Sheriff's Office, Florida  
Des Moines, Iowa  
Omaha, Nebraska

**PROFESSIONAL TRAINING:**

Executive Management  
University of North Carolina  
Chapel Hill, North Carolina

Miami Police Academy  
Miami, Florida

Dade County Police Academy  
Miami, Florida

Seminole Police Academy  
Sanford, Florida

Leadership of Orlando  
Orlando, Florida

Court Testifying  
Dade County, Florida

Human Diversity  
Orlando, Florida

Dangerous Liaisons, Employee Violence  
Miami, Florida

Proving and Defending Damages in Personal Injury Cases  
Tampa, Florida

Ethics and Professionalism in the Practice of Law  
Miami, Florida

**WRITINGS;**

Text Book "The Police Manager"  
Anderson Publishing Company

Chapter- Text Book "Handbook of Loss Prevention and  
Crime Prevention"  
Butterworth Publishing Company

Articles in "Popular Government" magazine Institute of  
Government University of North Carolina  
Chapel Hill, North Carolina

**REFERENCES:**

Have been certified as an expert in Circuit Court in Florida  
in Police Procedures and Premises Security

List of cases provided upon request

Other references furnished Upon Request

*Ronald G. Lynch J.D.  
Consultant  
4832 Eaglesham Drive  
Orlando, Florida 32826*

*(407) 275-2614*

*Fax (407) 482-1664*

### **FEE SCHEDULE**

#### **Preliminary Discussion of Cases**

Telephonic discussions of potential cases are welcomed. There is no charge for this service. There is no charge for an initial visit if held within 50 miles of my home in Orlando.

#### **Cases Accepted for Consultation**

There is a fee of \$250.00 per hour for those cases accepted for consultation, development and preparation. A non-refundable \$2500.00 case development fee is required.

There is no charge for telephonic discussions at any time during the preparation of the case. Telephone conversations are welcomed in order to maintain an effective working relationship.

This case fee covers all work performed in Orlando including document review and analysis, discovery and review of additional materials, research, written reports and affidavits. Written reports will be prepared only when specifically requested by you or your firm.

#### **Depositions, Testimony, On-Site Inspections and Conferences**

I will normally try to arrange my travel schedule to ensure that we will be able to meet prior to deposition or testimony.

The hourly fee applies to depositions, on site inspection and conferences.

The fee does not apply to actual time of testimony in a trial, only the normal witness fee is required. The fee does apply to time spent for travel to court or time used waiting to testify.

All special expenses incurred, such as special police reports or special photographs, shall be the responsibility of your firm.

#### **Payment Requirements**

The initial non-refundable fee is requested when you provide the initial materials. The final invoice will be forwarded upon completion of the work performed.

*Ronald G. Lynch JD.  
Consultant  
4832 Eaglesham Drive  
Orlando, Florida 32826*

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### LETTER OF AGREEMENT TO HIRE

Style:

This letter will confirm our agreement in the above styled case.

I agree to review policies, procedures, training, methodology and other matters as it relates to police practices and procedures. This requires the reading of depositions, personnel folders, agency regulations, all pertinent reports, photographs and all related materials. If requested I will research the law as it relates to the specific issues in the lawsuit. I will perform on site examinations and analysis of data as needed.

I will form opinions based upon the materials presented, any professional standards that may apply, my education, experience and training and be prepared to present and explain these opinions for any depositions or for testimony at trial.

My fee for these services is \$250.00 per hour. No fee shall be charged for telephone conversations or for my actual time testifying in court.

A ten-hour retainer (\$2500.00) is requested at the time of the forwarding of documents for analysis.

I look forward to working with you on this case.

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Attorney for

Date

*Ron G Lynch*

Ronald G. Lynch

Date

Expert Witness

## HISTORY OF CASES

**TITLE:** Pusharewicz vs. Oak Shadow Condominium Association and  
Courteous Communications, Inc.  
**COURT:** Circuit Court Orange County Florida.  
**ATTORNEY:** Barry Morgan, Orlando Fl  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1995, rape of tenant, for the plaintiff, settled at mediation

**TITLE:** Freeman vs. Sun Bank  
**COURT:** Circuit Court Orlando Fl.  
**ATTORNEY:** Robert Hannah Orlando Fl.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1995, assault at A.T.M., for the defendant, settled at mediation

**TITLE:** Freiss vs. Bal Harbour Shops and Venetia Condominium  
**COURT:** Circuit Court, Dade County Florida  
**ATTORNEY:** Michael Ferrin West Palm Beach Fl  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** 1995, kidnapping at mall, poor security at the condo, for the plaintiff  
settled

**TITLE:** Whitton vs. City of Leesburg, Florida  
**COURT:** Circuit Court, Lake County Florida  
**ATTORNEY:** H. Ross Davis Winter Park, Florida  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** 1995, Police pursuit resulting in death, for the plaintiff, certified as expert

**TITLE:** Honcharuk vs. Green and City of Goldsboro  
**COURT:** United States District Court, Eastern District of N.C., Raleigh Division  
**ATTORNEY:** W. Harrell Everett Jr. Goldsboro, N.C.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1995, excessive force by police, for the defendant, case settled

**TITLE:** Linda & Salvador Surdi vs. Sun Bank  
**COURT:** Circuit Court, Pinellas County Florida  
**ATTORNEY:** Glenn G. Gomer, Tampa, Florida  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** 1995, assault & kidnapping from ATM, for the defendant, settled



**TITLE:** Goodman vs. David Hendershott, Maricopa County, Arizona  
**COURT:** Superior Court, Maricopa County, Arizona  
**ATTORNEY:** Katherine Baker, Scottsdale, Arizona  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1995 Deputy claims privacy was violated, for the defendant

**TITLE:** Smith vs. Maricopa County, Arizona  
**COURT:** Superior Court, Maricopa County, Arizona  
**ATTORNEY:** Melinda K. Cekander, Phoenix, Arizona  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1995 Inmate died of heart failure, claims jailers should have known about medicine, for the defendant, dismissed at motion hearing

**TITLE:** Lawrence v Westshore Mall  
**COURT:** Circuit Court, Hillsborough County Fla.  
**ATTORNEY:** Richard A. Hirsch, Tampa, Florida  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** 1996, plaintiff was injured in parking lot as result of strong-arm robbery for the plaintiff

**TITLE:** Watson v Walgreen  
**COURT:** Circuit Court, Lee County, Florida  
**ATTORNEY:** Kennan Dandar, Tampa, Florida  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** 1996, Security coerced a statement from an employee, malicious prosecution for the plaintiff, case settled.

**TITLE:** Fantozzi v Volunteers of America and "PAMCO"  
**COURT:** Circuit Court, Hillsborough Co. Fla.  
**ATTORNEY:** Richard A. Hirsch Tampa, Florida  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** 1996, Victim was shot by a neighbor in an apartment complex, both mental illness, for the plaintiff

**TITLE:** Yeung v Wang  
**COURT:** Circuit Court Orange Co. Fl.  
**ATTORNEY:** John S. Plummer, Orlando, Florida  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1996, Plaintiff was beaten in rear of store next to property of Wang for the defendant, settled.

**TITLE:** Jane Doe v Calumet City and Horka  
**COURT:** Circuit Court, Cook County, Illinois  
**ATTORNEY:** Robert B. Baal, Chicago, Illinois  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1996, involving rape of 12 year old and alleged lack of action by police for the defendant Horka, case settled

**TITLE:** Ottoman v Voutour, City of Jacksonville etc.  
**COURT:** United District Court, Middle District of Florida  
**ATTORNEY:** Blane G. McCarthy, Jacksonville, Florida  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** 1996, police recruit was injured in defensive tactics class, for the Plaintiff, settled.

**TITLE:** State of New Hampshire v Eric Bennet  
**COURT:** Hillsborough County Superior Court  
**ATTORNEY:** Caroline Smith, Public Defender, Manchester N.H.  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** 1996, defendant choked a passenger in a car, charged with Second Degree Murder, for the defense

**TITLE:** Janet Jackson v Police Chief Thomas Mills et al  
**COURT:** United States District Court, Eastern District Pa.  
**ATTORNEY:** Martha Sperling, Doylestown, Pa.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1996, plaintiff was arrested and sprayed at a disturbance, for the Plaintiff, settled.

**TITLE:** Lemonik v Metro Dade County  
**COURT:** Circuit Court, Dade County Florida  
**ATTORNEY:** Arthur Tifford, Miami Fl.  
**DEPOSITION:** No **TRIAL:**  
**REMARKS:** 1997 Involves arrest of plaintiff at the airport, Eastern Airlines and canceled flights, alleged assault by plaintiff and illegal arrest of plaintiff for the plaintiff

**TITLE:** Villares & Diaz v Days Inn  
**COURT:** Circuit Court, Orange County Fl.  
**ATTORNEY:** Maria D. Tejedor, Orlando Fl.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1997, plaintiffs were victims of robbery, for the plaintiff

**TITLE:** FI Department of Insurance v. Landau Enterprises  
**COURT:** Circuit Court Volusia County  
**ATTORNEY:** Lance P. Richard, Palm City, FL.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1997, car stolen from impound lot, for the plaintiff. Settled

**TITLE:** Adams v Indian Harbour  
**COURT:** Circuit Court, Brevard County, Fl.  
**ATTORNEY:** Charles Smith, Titusville, Fl.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1997, plaintiffs, husband and wife arrested for concealed weapon in vehicle, wife sexually harassed by police officer, for the plaintiff case settled.

**TITLE:** Blankenship v Plitt Theaters v Diversified Developers Realty Corp  
**COURT:** Circuit Court, Hillsborough County, Florida  
**ATTORNEY:** Kieth Thomas, St. Petersburg Fl.  
**DEPOSITION:** Yes **TRIAL:** Arbitration Hearing  
**REMARKS:** 1997, cleaning person assaulted while cleaning movie, for the defendant Realty Corp

**TITLE:** Charlton (Ann Durso) v Pinter  
**COURT:** Circuit Court, Brevard County, Florida  
**ATTORNEY:** Carey Bos, Orlando Fl.  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** 1997, victim was murdered while working at storage company. For the defendant

**TITLE:** Gambino v Orlando Storage & Sovran Capital Inc  
**COURT:** Circuit Court, Orange County, Florida  
**ATTORNEY:** Carey Bos, Orlando Fl.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1997, victim was assaulted while getting his hot dog cart from the storage bin. For the defense, case settled.

**TITLE:** Cabella v Boca Ciega Point Condo  
**COURT:** Circuit Court, Pinellas County Florida  
**ATTORNEY:** Sean McDonough, Orlando Fl.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1997, victim had jewelry stolen from her condo by employee, for the defense, settled.

**TITLE:** R. Lacey v City Deland, School Board, Volusia County PAL,  
**COURT:** Circuit Court, Volusia County, Florida  
**ATTORNEY:** Donald Meyers, Orlando Fl.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1997, teenager killed on school grounds after basketball game, for plaintiff, settled.

**TITLE:** Hessler v Gators Dockside  
**COURT:** Circuit Court, Orange County Florida  
**ATTORNEY:** John McDonough, Orlando  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1997 Plaintiff was assaulted while a customer in the resturant, for the plaintiff. Settled

**TITLE:** Cooley v City of Tampa  
**COURT:** Circuit Court, Hillsboroug, Fla.  
**ATTORNEY:** Ken Dandar, Tampa  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** 1997, police officers entered plaintiff's home and are accused of an illegal entry use of illegal force, for the plaintiff. Settled.

**TITLE:** Lezotte v O'Rourke  
**COURT:** Superior Court, Santa Clara, California  
**ATTORNEY:** Kieth Bower  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1998 Ref police procedures concerning promotion, for plaintiff. Settled

**TITLE:** Houston vs Service America Corporation  
**COURT:** Circuit Court, Pinellas County, Fl.  
**ATTORNEY:** Ms. Dawn Millner  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1998, double homicide in warehouse owned by defendant, for the defense case dismissed.

**STYLE:** O'Der v Pinkard et al  
**COURT:** Circuit Court, Henry County, Va  
**ATTORNEY:** Ms. Kim White  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1998, ref police procedures concerning emergency driving, for defendant

**STYLE:** State of Fl v Patrick McIntyre  
**COURT:** Circuit Court, Indian River County  
**ATTORNEY:** James Harpring  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 1998, ref police procedures in murder investigation, for defense

**STYLE:** Estate of Baer etc v City of Tampa

**COURT:** Circuit Court, Hillsborough County

**ATTORNEY:** Richard Hirsch

**DEPOSITION:** Yes **TRIAL:** No

**REMARKS:** 1998, ref police pursuit, accident, two innocent citizens killed, for plaintiff, settled.

**STYLE:** State of Florida v Shae Dunbar

**COURT:** Circuit Court Miami-Dade County

**ATTORNEY:** Gregory Mangone

**DEPOSITION:** No **TRIAL:** No

**REMARKS:** Off duty Miami-Dade police officer involved in a fight, victim shot and killed, officer charged, 1998, for the defense, settled.

**STYLE:** Warwick v Valencia County, Detective Mallory et. al.

**COURT:** United States District Court, Albuquerque, New Mexico

**ATTORNEY:** Thomas Briones

**DEPOSITION:** Yes **TRIAL:** No

**REMARKS:** Plaintiff claims police performed illegal search, left her property open and items missing, 1998, for the defense, settled.

**STYLE:** Morris v City of Sebastian

**COURT:** U. S. District Court for Southern Florida

**ATTORNEY:** K. Piscitelli, Orlando Fl.

**DEPOSITION:** Yes **TRIAL:** No

**REMARKS:** Female officer claiming sexual harassment and retaliation for filing EEOC complaint, 1999 for the plaintiff, settled.

**STYLE:** Creamer v Pinellas County

**COURT:** Circuit Court, Sixth District, State of Florida

**ATTORNEY:** S. Segall

**DEPOSITION:** Yes **TRIAL:** No

**REMARKS:** Involved an high speed pursuit, for the plaintiff., 1999, settled.

**STYLE:** Sargeant v Publix Super Markets Inc.

**COURT:** Circuit Court, Pinellas County, Florida

**ATTORNEY:** Council Wooten, Orlando

**DEPOSITION:** Yes **TRIAL:** Yes

**REMARKS:** Victim was killed in parking lot, for the plaintiff. 1999.

**STYLE:** Barge v Wal-Mart Stores Inc.

**COURT:** Circuit Court, Seminole County, Florida

**ATTORNEY:** Bruce Gibson III

**DEPOSITION:** No **TRIAL:** No

**REMARKS:** Bystander injured during a shoplifting arrest, for the plaintiff. Settled

**STYLE:** Meadows v City of Kissimmee  
**COURT:** U.S. District Court, Middle District of Florida  
**ATTORNEY:** Ladd Fassett, Orlando  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** Plaintiff arrested as to fraud, 1999, for plaintiff, dismissed.

**STYLE:** Ruggerio v Grandview Hotel  
**COURT:** Circuit Court, 9<sup>th</sup> Judicial Circuit, Orange Co. Fla.  
**ATTORNEY:** Nicholas A. Shannin, Orlando Fl.  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** 1999, female injured by teenagers, for defense, settled.

**STYLE:** Jorge L. Salado-Martin v City of Tampa  
**COURT:** Circuit Court, 13<sup>th</sup> Judicial Circuit, Hillsborough County Fl.  
**ATTORNEY:** Stephen Segall, Tampa  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** High Speed Pursuit by Tampa P.D., 2000, for plaintiff

**STYLE:** Alpizar v Southland Corp. (7-11)  
**COURT:** Circuit Court, Orange County, Fl.  
**ATTORNEY:** Dennis Hightower, Orlando Fl.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** Plaintiff injured at store ref robbery, 1999, for plaintiff

**STYLE:** Palfrey v Terry Taylor Ford  
**COURT:** Circuit Court, 18<sup>th</sup> Judicial, Brevard County, Fl.  
**ATTORNEY:** Louis A. DeFreitas, Orlando Fl.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** Car stolen from dealer injures the plaintiff, for plaintiff, 2000

**STYLE:** State of Florida v Carl Walker  
**COURT:** Circuit Court, Seven Judicial Circuit  
**ATTORNEY:** Ordered by the Court  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** Named by the Court as to police procedure, use of force and pepper spray, 2000.

**STYLE:** Wetzler v Hillsborough County and Sheriff  
**COURT:** Thirteenth Judicial Circuit  
**ATTORNEY:** J. Crompton, Tampa Fl.  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** High speed pursuit out of county, 2000, for plaintiff

**STYLE:** State of Florida v Evans  
**COURT:** Circuit Court, Eighteenth Judicial Circuit  
**ATTORNEY:** Appointed by Court  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** Named by court for police procedures and use of force, settled..

**STYLE:** Hernandez v Miami-Dade County, Police Department  
**COURT:** U.S. District Court, Southern District of Florida  
**ATTORNEY:** Joseph Shook, Coral Gables, FL.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** Police officers arrest plaintiff in courthouse, 2000, for plaintiff, settled.

**STYLE:** Gomez v Cumberland County N.C.  
**COURT:** U.S. District Court, Eastern District of North Carolina, Southern Div.  
**ATTORNEY:** D. Canders, Assistant County Attorney, Fayetteville N.C.  
**DEPOSITION:** Yes **TRIAL:**  
**REMARKS:** Arrest of plaintiff for murder, charges dropped, 2000, for defense  
Settled

**STYLE:** Pagonis v The Green Iguana  
**COURT:** Circuit Court, Thirteenth Judicial District  
**ATTORNEY:** Joseph Rousselle Jr. Tampa Florida  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** Plaintiff injured in bar fight, 2000, for plaintiff, settled

**STYLE:** Patterson v City of Miami  
**COURT:** U.S. District Court, Southern District of Florida  
**ATTORNEY:** Kelsay Patterson, Coral Gables FL.  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** Arrest of plaintiff on street corner, 2000, for plaintiff

**STYLE:** Campbell v Hillsborough County  
**COURT:** Circuit Court, Thirteenth Judicial Circuit, Hillsborough County, Florida  
**ATTORNEY:** Stephen Segall, Tampa FL.  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** High speed pursuit, for plaintiff, 2001.

**STYLE:** Jane Doe v. City of Largo  
**COURT:** Circuit Court, Sixth Judicial Circuit, Pinellas County, Florida  
**ATTORNEY:** Richard Hirsch, Tampa FL.  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** Involves police officer who has sex with 16 yr old. For the plaintiff,  
settled, 2001.



**STYLE:** Lisa Wade v City of Tampa  
**COURT:** Circuit Court, Hillsborough County  
**ATTORNEY:** George Stark, Tampa  
**DEPOSITION:** No **TRIAL:**

- **REMARKS:** Three-year-old in vehicle pursued by police, death. For plaintiff, settled. 2001.

**STYLE:** Allen v Miami-Dade  
**COURT:** U.S. District Court, Southern District of Florida  
**ATTORNEY:** D. Tarlow, Miami  
**DEPOSITION:** No **TRIAL:** No

- **REMARKS:** Corrections officer with history of violence beats inmate. For the Plaintiff. 2001.

**STYLE:** Glaze v Centola and City of Atlanta  
**COURT:** U.S. District Court, Northern District of Georgia, Atlanta  
**ATTORNEY:** G. Harwick III, Atlanta  
**DEPOSITION:** No **TRIAL:** No

- **REMARKS:** Police officer shots subject at car inspection. For plaintiff, settled.

**STYLE:** B. Sweet Graham v City of Ocala  
**COURT:** Circuit Court, 5<sup>th</sup> Judicial District, Marion County, Fl.  
**ATTORNEY:** L. Edward McClellan Jr., Ocala  
**DEPOSITION:** Yes **TRIAL:** Yes

- **REMARKS:** Officer made promise to help plaintiff, did not perform, husband Shot wife. For plaintiff. 2001.

**STYLE:** Morris v. Hillsborough County Sheriff's Office  
**COURT:** Circuit Court, Hillsborough County  
**ATTORNEY:** Frank M. Gafford, Lake City

- **DEPOSITION:** Yes **TRIAL:** No

**REMARKS:** Deputy Sheriff answered 911 hangup, saw plaintiff in trailer, shot the plaintiff. For the plaintiff. 2001.

**STYLE:** Durruthy vs. City of Miami  
**COURT:** U. S. District Court, Southern District, Florida  
**ATTORNEY:** Marc Wites, Deerfield Beach, Fl.  
**DEPOSITION:** **TRIAL:**

**REMARKS:** 2001, arrest of TV cameraman during the Elian Gonzalez saga. For the plaintiff.



**STYLE:** Mohammed vs. Days Inn  
**COURT:** 9<sup>th</sup> Circuit, Florida  
**ATTORNEY:** Carey Bos, Orlando  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** 2002, Alleged theft of truck and tools, for defendant, settled.

**STYLE:** Durchslag vs. Braman Motors etc.  
**COURT:** U.S. District Court, South Florida  
**ATTORNEY:** John J. Shahady, Ft. Lauderdale, Fl.  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** 2002, plaintiff victim of false arrest, malicious prosecution,  
Involves Metro Dade detective, for plaintiff.

**STYLE:** Elder v. Manatee County  
**COURT:** U.S. District Court, Tampa Fl.  
**ATTORNEY:** Marc Falco, Sarasota  
**DEPOSITION:** **TRIAL:**

**REMARKS:** Deputies used excessive force, serious injury, mental subject, for plaintiff.  
2002.

**STYLE:** Ortiz v. City of Miami  
**COURT:** U.S. District Court, Southern District Florida  
**ATTORNEY:** Joseph Shook, Miami  
**DEPOSITION:** No **TRIAL:** No

**REMARKS:** Officer shot plaintiff while making an arrest, for plaintiff. 2002.

**STYLE:** Ajamu v. City of Orlando  
**COURT:** Ninth Circuit, Orange County, Florida.  
**ATTORNEY:** Howard Marks, Orlando  
**DEPOSITION:** Yes **TRIAL:** No

**REMARKS:** Officers raided wrong house, detained plaintiff for seven hours, for  
plaintiff, 2002.

**STYLE:** Burns v. City of St. Augustine  
**COURT:** Seventh Circuit Court, St. Johns County  
**ATTORNEY:** Dale Parks, Tallahassee.

**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** Police arrest patron at club, broken neck, for plaintiff, 2003.

**STYLE:** McMeans v F.H.P.  
**COURT:** U.S. District Court, Northern District of Florida  
**ATTORNEY:** Parks and Crump, Tallahassee, Fla.  
**DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** Trooper shot passenger after traffic stop, for plaintiff, 2003

**STYLE:** Castetter v TLZ Properties  
**COURT:** Circuit Court, Orange County, Fl.  
**ATTORNEY:** Carey Bos, Orlando  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Assault on worker in garage, for defendant, 2003

**STYLE:** Robinson v Argenbright  
**COURT:** Circuit Court, Ninth Circuit, Florida  
**ATTORNEY:** W. Sublette, Orlando  
**DEPOSITION:** No **TRIAL:** No  
**REMARKS:** Assault in parking lot, for plaintiff, 2003

**STYLE:** Price v City of Tampa  
**COURT:**  
**ATTORNEY:** M. Wright, Tampa  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Pursuit with accident, for plaintiff, 2003

**STYLE:** Lloyd v City of Mt Dora  
**COURT:** Circuit Court, Fifth Circuit, Florida  
**ATTORNEY:** S. Williams, Miami  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** Arrest, use of force, negligent hire, retention and supervision, for plaintiff,  
2003

**STYLE:** Aldeman v City of Orlando  
**COURT:** U.S. District Court, Orlando  
**ATTORNEY:** Jack Nichols, Orlando  
**DEPOSITION:** No **TRIAL:** Yes  
**REMARKS:** Plaintiff followed in County, accident with plaintiff, for Plaintiff, 2003

**STYLE:** Burkett v Alachua County Sheriff  
**COURT:** U.S. District Court, Gainesville, Florida  
**ATTORNEY:** Willie Walker, Jacksonville, Florida  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Plaintiff, mental prisoner, hog tied in jail and expired, for the Plaintiff  
2003

**STYLE:** Dutcher v City of Palm Bay  
**COURT:** Circuit Court, Brevard County  
**ATTORNEY:** Robert Moletteire, Melbourne Fl.  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Domestic violence case, pursuit and accident, subject and Plaintiff, for Plaintiff, 2003

**STYLE:** Conley v Sheriff, Putnam County, Fl.  
**COURT:** Circuit Court, Putnam County  
**ATTORNEY:** Michael Woodward, Interlachen, Fl.  
**DEPOSITION:** Yes **TRIAL:** Yes  
**REMARKS:** At Raceway, fight, Deputy broke it up, for the Plaintiff, 2003

**STYLE:** Boice v Volusia County  
**COURT:** Circuit Court, Volusia County, Fla.  
**ATTORNEY:** Chris Wickersham, Daytona Beach  
- **DEPOSITION:** **TRIAL:**  
**REMARKS:** Search, seizure, handcuffed, issue of jurisdiction, for Plaintiff, 2003

**STYLE:** Rasher v City of Palatka  
**COURT:** U.S. District Court, Jacksonville, Fl.  
**ATTORNEY:** Paul Meridedith, Palatka, Fl.  
- **DEPOSITION:** No **TRIAL:** No  
**REMARKS:** Excessive force in arrest, for Plaintiff. Case settled, 2003

**STYLE:** Price and Harding v. Tampa P.D.  
**COURT:** Circuit Court, Hillsborough County, Fl.  
**ATTORNEY:** Mark Wright, Tampa, Fl.  
**DEPOSITION:** Yes **TRIAL:**  
**REMARKS:** Chase after alleged burglary, accident, subject struck plaintiffs, for Plaintiff, 2003

**STYLE:** Cook v City of Ocala, Fl.  
**COURT:** Circuit Court, Fifth Judicial Circuit, Florida  
**ATTORNEY:** Paul McMahon, Ft. Pierce, Fl.  
- **DEPOSITION:** Yes **TRIAL:** No  
**REMARKS:** Officer fatally shot subject on a traffic and possible drug stop. For the Plaintiff, 2004

**STYLE:** Alford v Cumberland County, N.C.  
**COURT:** U.S. District Court, Eastern District of N.C. Eastern Division  
**ATTORNEY:** Grainger Barrett, County Attorney, Cumberland County  
- **DEPOSITION:** **TRIAL:**  
**REMARKS:** Plaintiff was shot after plaintiff grabbed his weapon during drug raid. For the Defendant, 2004

**STYLE:** Marrero v City of Tampa P.D.,  
**COURT:** Circuit Court, 13<sup>th</sup> Judicial Circuit, Hillsborough County, Florida  
**ATTORNEY:** Richard Hirsch, Tampa Fl.  
**DEPOSITION:** Yes **TRIAL:**  
**REMARKS:** Police Officer was shot and killed by subject. For the Plaintiff, 2004

**STYLE:** Graham et al v City of Fayetteville, N.C.  
**COURT:** U.S. District Court, Eastern District of N.C. Eastern Division  
**ATTORNEY:** Ronnie Mitchell, Fayetteville, N. C.  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Police officers stopped black males reference anonymous phone call.  
For the Plaintiffs, 2004

**STYLE:** Jones v Sheriff Pasco County, Florida.  
**COURT:** U.S. District Court, Middle District of Florida, Tampa Division  
**ATTORNEY:** Joel Epperson, Tampa Fl.  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Deputy shot jewelry storeowner claiming she had a gun. For Plaintiff,  
2004

**STYLE:** Gay v Sheriff Lancaster  
**COURT:** Federal, Jacksonville  
**ATTORNEY:** Neil Henrichsen, Jacksonville Fl.  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Off duty deputy pulled plaintiff into water, for Plaintiff, 2005

**STYLE:** McCray v Ft. Lauderdale  
**COURT:** State Court  
**ATTORNEY:** Marco Gonzales, Coral Gables, Fl.  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Mental female shot at and attacked by police, for Plaintiff, 2005

**STYLE:** Jane Doe v Bay County etc.  
**COURT:** Circuit Court, Bay County  
**ATTORNEY:** Brian Hayes, Monticello, Fl.  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Female prisoner raped by van driver, left refused to send her to hospital,  
for plaintiff, 2005

**STYLE:** Lewis v England etc.  
**COURT:** U.S.District, Jacksonville  
**ATTORNEY:** Stephen DeNigris, Washington D.C.  
**DEPOSITION:** TRIAL:  
**REMARKS:** Navy personnel for DUI, duct taped the mouth, Plaintiff, 2005

~ **STYLE:** Burkett v Alacuha County  
**COURT:** U.S. District Court, Gainesville Fl.  
**ATTORNEY:** W. Walker—Jacksonville Fl.  
**DEPOSITION:** TRIAL:  
**REMARKS:** Use of Taser on prisoner at jail, 2003, Plaintiff

**STYLE:** Sparkman v Timber Sound Apts  
**COURT:** Circuit Court, Ninth Circuit, Orange County  
**ATTORNEY:** Carey Bos, Orlando  
**DEPOSITION:** TRIAL:  
**REMARKS:** Person killed for his custom car, 2006, Defense

**STYLE:** Telfort v Annamays Corp.  
**COURT:** Circuit Ct, Ninth Circuit, Orange County  
**ATTORNEY:** Carey Bos, Orlando  
**DEPOSITION:** TRIAL:  
**REMARKS:** Subject killed his girlfriend during sex, 06, Defense

**STYLE:** Rivera v Haines City, Fl.  
**COURT:** Circuit Court, Tenth Circuit, Polk County  
**ATTORNEY:** Howard Kay, Lake Wales, Fl.  
**DEPOSITION:** TRIAL:  
**REMARKS:** Auto accident, ref emergency call, 07, Plaintiff, Settled.

**STYLE:** Mulkin v Hawthorne Groves Apartment  
**COURT:** Circuit Court, Ninth Circuit, Orange County, Fl  
**ATTORNEY:** Carey Bos, Orlando  
**DEPOSITION:** TRIAL:  
**REMARKS:** Plaintiff shot, killed by home invasion, 2006, Defense

~ **STYLE:** Buckley v Sheriff, Washington County, Fl.  
**COURT:** U.S. District Court, Northern District, Fla.  
**ATTORNEY:** James Cook, Tallahassee  
**DEPOSITION:** TRIAL:  
**REMARKS:** Refused to sign ticket, Tasered many times, Resist/wo  
2006, Plaintiff

STYLE: Alces v Harrison County  
COURT: U.S. District Court, Southern District, Mississippi  
ATTORNEY: Woody Pringle, Gulfport, Mississippi  
DEPOSITION: TRIAL:  
REMARKS: Plaintiff beaten while in jail, jailors indicted for murder of others,  
2006, Plaintiff

STYLE: Sills v City of Coconut Creek, Florida  
COURT: Circuit Court, 17<sup>th</sup> Judicial District, Broward County, Fj  
ATTORNEY: Kenneth Carman, Boca Raton, Fl.  
DEPOSITION: TRIAL:  
REMARKS: Plaintiff arrested, taken to his home in another city, 2006, Defense

STYLE: Marsh v City of Cocoa, Florida  
COURT: Circuit Court, 18<sup>th</sup> Circuit, Brevard County, Fl.  
ATTORNEY: Frank Molica, Merritt Island, Fl.  
DEPOSITION: TRIAL:  
REMARKS: Subject being pursued, accident, 2006, Plaintiff

STYLE: Williams v East Baton Rouge Parish Sheriff's Office, Louisiana  
COURT: 19<sup>th</sup> District Court, Baton Rouge  
ATTORNEY: Dan Frazier, Baton Rouge, La.  
DEPOSITION: TRIAL:  
REMARKS: Pursuit, plaintiff third party injured, 2006, Plaintiff

STYLE: State v Ortiz  
COURT: Criminal Court, Orange County, Florida  
ATTORNEY: Derik Brett, Altamonte Springs, Fl.  
DEPOSITION: TRIAL:  
REMARKS: Deputy charged with perjury in depo, 2007, Defense

STYLE: Jane Doe v Jackson County and Bay County, Florida  
COURT: Circuit Court, 14<sup>th</sup> Judicial District, Jackson County, Fl.  
Circuit Court, 14<sup>th</sup> Judicial District, Bay County, Florida  
ATTORNEY: Brian Hayes, Monticello, Fl.  
Coy Browning, Fort Walton Beach, Fl.  
DEPOSITION: TRIAL:  
REMARKS: Plaintiff (Prisoner) raped while in transportation, 2006, Plaintiff

STYLE: Peskowitz v Village of North Palm Beach  
COURT: Circuit Court 15<sup>th</sup> Circuit, Palm Beach, Florida  
ATTORNEY: Anthony Gonzales, Boca Raton, Fl.  
DEPOSITION: TRIAL:  
REMARKS: Officer claimed sexual harassment and Whistleblower, 2006, Defense

**STYLE:** Galvez v Bruce, Deputy, Hillsborough, Florida  
**COURT:** U.S. District Court, Middle District of Florida, Tampa  
**ATTORNEY:** Thomas Luka, Orlando Fl.  
**DEPOSITION:** Yes **TRIAL:**  
**REMARKS:** Plaintiff arrested, use of force, 2007, Plaintiff

**STYLE:** Felicia Meservey ( Minor), v Apartment Complex  
**COURT:**  
**ATTORNEY:** George Brezina Jr, Tampa, Florida  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** 14 year old victim of rape as result of burglary, 2007, Plaintiff

**STYLE:** Sullivan v Publix Super Markets,  
**COURT:** Circuit Court, 11<sup>th</sup> Judicial Circuit, Broward County, Florida  
**ATTORNEY:** Jason Glusman, Ft Lauderdale, Fl.  
**DEPOSITION:** **TRIAL:**  
**REMARKS:** Worker and customer had a fight, 2007, Defense

**Summary of Cases**

	<b><u>Plaintiff</u></b>	<b><u>Defense</u></b>	<b><u>Court Appointed</u></b>	<b><u>Total</u></b>
<b>Police</b>	51	14	3	68
<b>Corrections</b>	5			5
<b>Security</b>	17	17		34
<b>Totals</b>	73	31	3	107